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Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

ALASKA INDUSTRIAL DEVELOPMENT
AND EXPORT AUTHORITY,

Plaintiff,

v.

BUREAU OF LAND MANAGEMENT, et
al.,

Defendants.

Case No. 3:24-cv-00282-SLG

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants Bureau of Land Management, et al., hereby move to modify initial scheduling deadlines in this case and to align the schedule in this case with the related case *State of Alaska v. U.S. Department of the Interior*, No. 3:25-cv-00003-SLG. Both cases challenge the December 2024 Coastal Plain Oil and Gas Leasing Program Record of Decision (“2024 ROD”) selecting Alternative D2 from the November 2024 Final Coastal Plain Oil and Gas Leasing Program Supplemental Environmental Impact

AIDEA v. Bureau of Land Mgmt.
UNOPPOSED MOT. FOR EXTENSION OF TIME

Case No. 3:24-cv-00282-SLG

1

Statement. *See* Compl. ¶ 1, ECF No. 1. A copy of the summons and complaint in this case was received in the office of the United States Attorney for the District of Alaska on December 26, 2024, establishing a deadline of February 24, 2025, for Defendants to answer or otherwise respond to the complaint. *See* Fed. R. Civ. P. 4(i), 12(a). In addition, Defendants’ counsel entered an appearance in this case on January 3, 2025 (ECF No. 6), establishing a deadline of March 4, 2025, for filing of the administrative record. *See* Local Civil Rule 16.3(b).

Good cause exists to modify both of these deadlines. Following a change in administration, on January 20, 2025, President Trump issued Executive Order 14153 titled *Unleashing Alaska’s Extraordinary Resource Potential*, 90 Fed. Reg. 8,347 (January 29, 2025), Section 3 of which directs heads of agencies to “exercise all lawful authority and discretion available to them” to take certain steps, including placing a “temporary moratorium” on, and conducting “review” of, the challenged 2024 ROD, and ultimately replacing the 2024 ROD. On February 3, 2025, Secretary Burgum issued Secretary’s Order 3422, also titled *Unleashing Alaska’s Extraordinary Resource Potential*, a copy of which is attached hereto as Exhibit 1. Section 6(a) of that Order directs agency officials to prepare, within 15 days of the issuance of the Order, an “action plan” that will describe “necessary and appropriate steps to execute” the above-described direction regarding the 2024 ROD. An extension will conserve judicial resources and promote the efficient and orderly disposition of the case(s), including by ensuring that any litigation continuing before this Court will reflect the views of current agency leadership and will account for any actions taken to implement the Executive Order and

Secretary's Order. Furthermore, requiring Defendants to proceed with preparing a defense of the 2024 ROD on the current litigation schedule while also determining how to address the President's direction to suspend, review, and supersede the same agency action would require inconsistent application of administrative resources and disserve the public interest in reasonable efficiency of agency operations.

In light of the foregoing, Defendants respectfully request that the Court issue an order extending the deadline to answer or otherwise respond to the complaint by sixty days, to April 25, 2025, and extending the deadline to file the administrative record to June 24, 2025. Defendants are requesting extensions to set the same deadlines in the related case, since they will involve the same administrative record and it otherwise makes sense to align the schedules in both cases. A proposed order is submitted herewith.

Counsel have conferred, and Plaintiff does not oppose this motion.

Respectfully submitted.

DATED: February 14, 2025.

LISA LYNNE RUSSELL
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/s/ Paul A. Turcke

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CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2025, a copy of the foregoing was served by electronic means on all counsel of record by the Court's CM/ECF system.

/s/ Paul A. Turcke
Paul A. Turcke